

Draft Feasibility Study Treatment Technology Evaluation Tools Memorandum

Specific Comments:

1. Page 2, Table 1. The LWG needs to use the attached table for Treatment Criteria in the draft FS. The Clean Fill requirement is broader than just upland unrestricted use. There are other columns in the table that show other values that may be acceptable for other uses.
2. Page 3, Table 2. EPA will be providing comments on the screening of technologies tables provided on April 14, 2011. Since the EPA has not agreed to the document at this time, the LWG should update the retained technologies for treatment in this document based on any future comments EPA has on the Technology Screen.
3. Page 3, Table 2, Dewatering. It should be noted that a range of dewatering technologies are being considered.
4. Page 3, Table 2, Thermal Treatment Technologies. It should be noted that the LWG will look at green sources of power for these technologies.
5. Page 4, In Situ Treatment, pp 1. The LWG should provide citations for documents demonstrating the effectiveness of activated carbon and other reagents. The LWG needs to specify any other reagents being evaluated in the Technology Screen and in Table 2.
6. Page 4, In Situ Treatment, General Step 1. It is unclear what the indicator COCs are for the evaluation of in situ treatment technologies. There needs to be a discussion of how the COCs will be selected for the evaluation in the draft FS. The LWG should be looking at the cited treatment capabilities for the technology. If the LWG wants to consider other potential use than those cited by other studies/uses, then the LWG needs to conduct a bench scale treatability study to demonstrate the effectiveness for that contaminant.
7. Page 5, In Situ Treatment, General Step 2. It is unclear what the LWG means by “concentration distribution plots.” Are these the maps in the draft RI showing contaminant concentrations of samples or is the LWG producing something different? If something different is being used, please discuss and provide an example. The LWG needs to describe how implementability and feasibility of treatment be evaluated and determined.
8. Page 5, In Situ Treatment, General Step 3. This statement seems more like a conclusion than a process step to identify SMAs. This should be revised to a statement regarding how the LWG is going to conduct the evaluation for the draft FS rather than making a statement about the expected outcome.
9. Page 5, In Situ Treatment, General Step 4. The basis for excluding in situ treatment in the navigation channel is not clear. Please provide this basis.
10. Page 5, Ex Situ Treatment. It is overly conservative to assume that treated sediment must meet unrestricted use requirements to have a potentially beneficial use. Ideally, treatment would achieve unrestricted use levels, but unrestricted use should not be the only treatment goal and should not be the sole basis for exclusion of ex situ treatment in the draft FS. For example, contaminated sediment could be treated to a level where the sediment could provide a beneficial use, e.g., foundation of an upland cap.

11. Page 5, Ex Situ Treatment. It is not appropriate to screen out ex situ treatment because beneficial uses have not been identified. Even though the LWG suggests that this can be reconsidered during remedial design, EPA wants some level of analysis in the draft FS. If ex situ treatment is not evaluated in the draft FS, then it would be difficult to substantiate including it in a ROD. In that case an ESD or ROD amendment may be needed to include it during remedial design. Since CERCLA has a preference for treatment and the purpose of ex situ treatment evaluation in the FS is to evaluate the cost of treating dredged material for a use versus disposal, the LWG needs to provide the anticipated treatment capabilities, discuss the possible beneficial uses of the treated sediments based on the resulting treated levels, and the costs for that treatment in the draft FS.
12. Tables 1 and 2. EPA will make comments on these with our comments on the tables provided on April 14, 2011. These tables should be modified or removed and referenced to any final tables based on EPA's comments.